



RUBBER
manufacturers
association

DEPT. OF TRANSPORTATION
DOCKETS

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August 12, 2008

The Honorable Nicole R. Nason
Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: 49 CFR 571.109
New Pneumatic and Certain Specialty Tires

Dear Ms. Nason:

The Rubber Manufacturers Association ("RMA") and its tire manufacturer members* remain committed to assisting the National Highway Traffic Safety Administration ("NHTSA") in developing meaningful safety standards for tires. To that end we call your attention to a recent standard test method developed within the ASTM International Committee F09 on Tires. The standard is ASTM F 2663-07a, Bead Unseating of Tubeless Tires for Motor Vehicles with GVWR of 4536 kg (10,000 lb) or less.

In the current edition of 49 Code of Federal Regulations, Chapter V, §571.109, Section S5 Test Procedures, Subsection S5.2 Tubeless tire bead unseating resistance, Paragraph S5.2.1.3, reference is made to "...a fixture shown in Figure 1, and...bead unseating block shown in Figure 2 or Figure 2A ...".

Unfortunately, Figure 1 does not provide for:

1. An "A" dimension for tires with a rim size diameter code greater than 20; and
2. Figures 2 and 2A, showing diagrams of bead unseating blocks, do not provide suitable geometries for use on lower aspect ratio, and larger diameter tires.

* The Rubber Manufacturers Association (RMA) is the leading national trade association representing the interests of the tire and rubber manufacturers in the United States. RMA's membership includes all of the country's major tire manufacturers: Bridgestone Americas Holding, Inc.; Continental Tire N.A., Inc.; Cooper Tire & Rubber Company; The Goodyear Tire & Rubber Company; Michelin North America, Inc.; Pirelli Tire North America; Toyo Tire North America, Inc.; and Yokohama Tire Corporation.

Solutions to both problems are provided in the newly approved ASTM F2663-07a:

1. The ASTM standard states that the lower of the "A" dimension published in Annex A1, Fixtures and Settings, Table A1.1, or the "A" dimension derived from the formula in paragraph 11.10, can be used to assure that the shoe is placed where intended to evaluate de-beading; and
2. Additional Annex A1 Figures, A1.2, A1.3, A1.4, and A1.5 provide for a variety of bead unseating blocks *and* adaptors *for* RJS style machines. *The identification of the recommended block associated with each rim diameter code is also specified in Table A1.1.*

We respectfully petition NHTSA to update FMVSS 109 to address the problems and proposed solutions as cited above. The agency may want to revise the existing figures and table in the current regulation or to simply reference, within the regulation, the ASTM F2662-07a, *paragraph 11.10 and annex A1 Fixtures and Settings*. We do not anticipate that the updates proposed in this letter will be controversial, but rather we see them as a means to address an otherwise overlooked condition that will allow the regulation to have greater application to more tires.

On a related issue, you may be aware that ASTM International has also published a revision to ASTM F 414 which is relevant to §571.109, Section S5.3 Tire Strength. However, ASTM Committee F-09 Tires is making further technical corrections to this standard. Therefore, we do not recommend that you incorporate the current version of ASTM F 414-06 into §571.109. We will inform you when ASTM F414 has been revised.

Thank you for your consideration of our request. Please do not hesitate to contact me if you have any questions, or if I can be of any assistance on this matter.

Sincerely,



Copy: Mr. Ronald L. Medford, Senior Associate Administrator
Mr. Anthony M. Cooke, Chief Counsel
Mr. Stephen R. Kratzke, Associate Administrator for Safety Performance Standards